

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

FILED  
U.S. DISTRICT COURT  
MASSACHUSETTS  
SEP -9 P 2:48  
CIVIL ACTION NO. 1:04-CV-10797-GAO  
EASTERN DIVISION  
U.S. DISTRICT COURT  
MASSACHUSETTS

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)  
MARK ULIANO,  
Plaintiff  
)  
)  
vs.  
)  
)  
MARIE H.BISSELL and  
KENNETH J. TILDEN,  
Defendants  
)  
)

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PLAINTIFF, MARK ULIANO'S, EXPERT DISCLOSURE PURSUANT TO  
FED.R.CIV.P. 26(a) (2)

Now comes the Plaintiff and files the within Expert Disclosure as follows:

1. Plaintiff, Mark Uliano, may or will call Jay Portnow, M.D., Ph.D., 377 Belmont Street, Brockton, Massachusetts, to testify as a medical expert witness in his behalf.

2. Dr. Portnow's curriculum vitae is attached hereto as Exhibit "A".

3. Dr. Portnow's report dated March 1, 2003, on his treatment and examination of the Plaintiff is attached hereto as Exhibit "B".

4. It is anticipated at trial, Dr. Portnow will testify in accordance with his report and that his opinions rendered while testifying will be based upon his treatment of the Plaintiff, his examination of the Plaintiff, his review of the Plaintiff's medical records, and his education and experience as is set forth in Exhibits "A" and "B".

5. Dr. Portnow's fee for testifying at deposition is \$2,500 per half day, and \$5,000 per day for testimony in Court.

Respectfully submitted,

PLAINTIFF,  
By his attorneys,

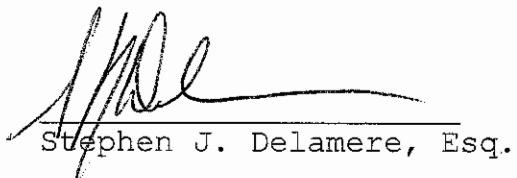


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Dated: Sept. 8, 2005

CERTIFICATE OF SERVICE

I, Stephen J. Delamere, hereby certify that on the above date I caused a true and correct copy of Plaintiff's Expert Disclosure to be served upon Defendant Marie Bissel's counsel, James C. Crowley, Fuller, Rosenberg, Palmer & Beliveau, 340 Main Street, Worcester, MA 01608, Defendant Kenneth Tilden's counsel, Robert Turner, Avery, Dooley, Post & Avery, LLP, 90 Concord Avenue, Belmont, MA 02478, and Elton Watkins, III, Esq., 238 Essex Street, 2<sup>nd</sup> floor, Lawrence, MA 01840 by first class mail, postage prepaid.



Stephen J. Delamere, Esq.